

EXHIBIT B –

**PSC’S RESPONSES TO ST. THOMAS
NEUROSURGICAL’S STATEMENT OF
UNDISPUTED FACTS**

NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION
VIDEOTAPED DEPOSITION OF DEBRA SCHAMBERG, R.N. on 02/04/2015

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND
COMPOUNDING PHARMACY,
INC. PRODUCTS LIABILITY LITIGATION MDL No. 2419
Master Dkt:
1:13-md-02419-RWZ

THIS DOCUMENT RELATES
TO:

All Actions

VIDEOTAPED DEPOSITION OF
DEBRA SCHAMBERG, R.N.

9:06 a.m.
February 4, 2015

Suite 1100
315 Deaderick Street
Nashville, Tennessee

Blanche J. Dugas, RPR, CCR No. B-2290



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1 Q. What's your understanding of how many
2 people suffered fungal meningitis infections in
3 addition to the ones who died after receive -- after
4 receiving those injections -- epidural steroid
5 injections at that particular clinic?

6 A. I don't have the exact number.

7 Q. Are there any neurosurgeons who currently
8 work at St. Thomas Neurosurgical?

9 A. All of the neurosurgeons have consulting
10 privileges.

11 Q. Right, I understand that. But are there
12 any of them that actually provide treatment to
13 patients at St. Thomas Neurosurgical now?

14 A. No.

15 Q. All right. And so why is it that that
16 entity is licensed as an ambulatory surgery center,
17 but there are no neurosurgeons who actually treat
18 patients there?

19 A. We operate as an ambulatory surgery center.
20 We follow all of the regulations for an ambulatory
21 surgery center.

22 Q. Even though neurosurgeons don't perform
23 surgery there; is that correct?

24 A. That is correct.

25 Q. In addition to epidural steroid injections,



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1 are there any other types of procedures that were
2 performed at St. Thomas Neurosurgical in 2011 and
3 2012?

4 A. Denervations and stem trial.

5 Q. Stem what?

6 A. Stem trials.

7 Q. Denervations and stem trials?

8 A. Correct.

9 Q. What's a stem trial?

10 A. Patients that are being evaluated for a
11 spinal cord stimulator.

12 Q. And what is a denervation?

13 A. It's a burning of the ancillary nerve
14 that's causing the pain.

15 Q. And I take it -- well, let me do this,
16 before we move to a different area, let me hand you a
17 document which we'll make Exhibit No. 25, which is
18 Bates number STOPNC_408. And let me just ask you if
19 this is a copy of your resumé?

20 (Exhibit 25 was marked for
21 identification.)

22 THE WITNESS: Yes, it is.

23 Q. (By Mr. Nolan) And has St. Thomas
24 Neurosurgical ever been found by the Department of
25 Health to have any particular deficiencies or



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1 Q. Okay. If you look at that page, do you see
2 that for August 2012 it lists 504; correct?

3 A. That is correct.

4 Q. And that's the same number that is in the
5 e-mail that is the first page of Exhibit 57; correct?

6 A. Correct.

7 Q. And then if you turn to the -- if you hold
8 the document so the staple is in the lower right-hand
9 corner on what I'm going to call the back page.

10 A. Uh-huh (affirmative).

11 Q. This is a list of all of STOPNC's
12 procedures for 2012, correct, up through August?

13 A. Correct.

14 Q. And you mentioned that STOPNC -- you
15 mentioned this morning that STOPNC did two other
16 procedures, one was called a denervation and one was
17 called a stem trial.

18 A. Yes.

19 Q. And this document has a row for stem trial
20 about halfway down the left-hand side of the page I've
21 been asking about. Do you see that?

22 A. Yes.

23 Q. This indicates that STOPNC did zero stem
24 trials in 2012?

25 A. That is correct.



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